

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : **Bk. No. 18-14781-ref**  
**PATRICK JULES** :  
**Debtor** :  
: **Chapter No. 13**

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned appears for **LOANCARE, LLC** ("the Creditor"), and pursuant to Bankruptcy Rule 2002(g) and 2002(h) and 9007 and §1109(b) of the Bankruptcy Code, with regards to the real property, located at 5551 SPRING RIDGE DRIVE WEST, MACUNGIE, PA 18062-9569 with the mortgage recorded on May 31, 2005 Instrument Number 7267018 demands that all notices that are required to be given in this case and all papers that are required to be served in this case, be given to and served upon the undersigned at the office, post office address and telephone number set forth below.

**PLEASE TAKE FURTHER NOTICE** that pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral whether transmitted or conveyed by mail, delivered, telephone, telegraph, telex or otherwise which affect or seek to affect in any way the Creditor's rights or interest, with respect to Debtor or the property on which Creditor holds a first mortgage lien.

April 17, 2019

/s/ Thomas Song, Esquire  
Thomas Song, Esq., Id. No.89834  
Phelan Hallinan Diamond & Jones, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Phone Number: 215-563-7000 Ext 31387  
Fax Number: 215-568-7616  
Email: Thomas.Song@phelanhallinan.com